

H04497      Convair Systems  
3302 Pacific Hy

**FIELD NOTES FROM 07-20-90 ONSITE INSPECTION by C. Graulau**

Field visit/inspection with Ben Franklin, John Fields, Jim Atkinson. We arrived onsite at 10:00am. We secured a cart and began the inspection with the Transportable Treatment Unit onsite, operated by PPG (previously Thortec). John stated that the TTU is scheduled to be relocated from its current position outside Bldg.4 to the south end of the plant. John stated General Dynamics has a contract with PPG until 12-91. John stated that a portion of the area PPG is currently occupying would eventually house the permanent onsite industrial wastewater treatment facility, and would be subject to FTU criteria with the state.

John explained that PPG is onsite 6-10 times per year and they are the only state-permitted TTU that can handle inorganic waste. John stated that when PPG employees are onsite, they handle 3-4K gallons wastewater per day, creating approximately 1000 Tons/year. The treated wastewater is analyzed for 7 metals (copper, lead, zinc, nickel, silver, cadmium, chromium).

John explained that a vacuum truck pulls waste out of a generation point (16 possible waste streams which are managed in batches) and is placed in one of 4 above-ground plastic tanks (6500 gal capacity each). When the TTU comes onsite, they work 10 hr days, processing the batches, and creating a filter cake. Each day the filter cake which is generated is taken to a roll-off in the hazardous waste storage area.

John stated that he is most concerned with pH, normality and chromium content of the wastewater. I asked John if the State DOHS or EPA had inspected the TTU onsite. John stated that the PPG TTU is inspected about 2 times a year by the State, and it usually happens when they are onsite at Convair.

I asked John if the aboveground tanks holding waste were subject to a State TSDF permit for storage of >5000 gals of hazardous waste. I stated that I thought in California Health and Safety Code, Section 25123 (definition of storage facility), if a facility held >5000 gals of hazardous waste onsite, they would need a storage permit. John stated that if a generator holds >5000 gals of hazardous waste onsite then the facility needed to be in compliance with aboveground storage tank requirements in Title 22. I observed that there was a hazardous waste label hanging on a plate, on a tank valve for Tank #138. John explained they do label the tank as hazardous waste, and when it is empty, they turn the label around, which reads 'empty'

I stated that in the latest version of California Health and Safety Code, I noticed a new Chapter (6.75), which related to aboveground storage tanks, and I hadn't noticed any new Title 22

regulations relating to aboveground storage tanks. John stated that the regulations had always been there. John also stated that none of the aboveground storage tanks onsite at this facility met the requirements for Title 22 and/or 40CFR. John stated that they now had 6 aboveground storage tanks onsite:

- (3) 675 gals aboveground tanks of waste oil
- (1) 6500 gal aboveground tank of spent coolant
- (2) 6500 gal aboveground Baker tanks

We next visited the Hazardous waste storage area. John explained that the yard is broken into two main sections. One section held drummed hazardous waste and the other section held lab pack hazardous waste, empty drums, and supplies for lab-packing. Outside the fenced storage area we observed (3) 10 ton (20 cu yd) roll-offs, and the 2 baker tanks. John explained the contents of each roll-off first:

One roll-off was designated for F006 waste from PPG. He stated that this filter-cake waste usually stays onsite about 60 days before sending to USPCI for landfill.

The other two roll-offs were designated for California only waste, primarily uncured, pre-preg fabrics. They use the California waste #352. John stated that another facility, a few years ago, had conducted the fat-head minnow test on this waste and found that it did not pass. John stated that is how Convair made the determination to handle this as a hazardous waste.

John explained that the 2 baker tanks had originally been loaned for a project in which the facility was testing a process modification in Building 3. John stated that an FLP acid etch had been substituted with a nitric/ferric solution (P2 etch). John explained that one baker tank had held the P2 etch and the other baker tank had held the FPL etch. Since the P2 etch passed inspection, Convair is going to designate the FPL etch as hazardous waste, sometime next week. John stated that Tank #304 in Building 3 no longer contains a chromated solution. Then he stated that the baker tank that held the P2 etch was now holding 5K gallons of tank #134 (chromic acid waste), which was pumped on 07-18-90. John stated this will be going out as hazardous waste as well. John also stated that 5K gallons of sump water was pumped for treatment by the TTU.

I asked who labels the drums as hazardous waste at the satellite generation points. John explained that they consider the generator point of contact to be the production supervisor. This person is responsible for labeling the drum, keeping it closed. John stated that Jim is responsible for inspecting the generator satellite accumulation points once a month, and the hazardous waste storage area once a week. John stated that the "generator" calls ERM for a pickup of a barrel of hazardous waste, and John considers that his first day of the 90 day clock. John stated this was done despite having 72 hours to do so. The generator is given a

maintenance work order (MWO), which is put on the generator hazardous waste in-house label. Then Jason Fontaine (who replaced Jim Atkinson) brings the waste from the satellite accumulation point into the hazardous waste storage area. Drummed waste is staged for sampling and analysis by the chemist. The results of the analysis are sent to John Fields.

We looked at the hazardous waste staged for lab-packing. John explained that they have a contract with Rollins for lab-packing this waste. He stated they have 2 full-time employees work in this area. John explained that this waste comes in salvage tubs, Rollins employees separate the waste by category, into green tubs, and when enough waste has accumulated for an overpack, Rollins employees do the lab-packing. John stated that the date the overpack is made is when he begins the 90day clock.

I observed a large number of contaminated rags in plastic bags, labeled as hazardous waste. I asked what was the possibility of doing rag laundry onsite. John stated the facility spends a large amount on contaminated rag disposal and doing rag laundry may be an additional project once the fixed treatment unit was online.

I observed a series of four drums which were in the lab-pack area and asked what occurred here. John explained that at this point Rollins will sometimes consolidate waste which has reached the yard. He stated that on occasion, he will received several containers of small size that hold waste, which he does not want to labpack. He said they mostly consolidate solvent, paints, and flammable materials, although they have also done acids and caustics. He stated that this is considered to be a satellite accumulation point.

We then observed the drummed waste area. John explained the area is divided into four generic sections. One section has drummed waste staged for sampling. This section occupied about half the entire area. The other sections were drummed wastes which had been analyzed and were separated by DOT hazard categories. These categories were solvents, inorganics, and paints.

John stated that he was aware the hazardous waste storage area did not meet the criteria as specified in Title 22 or 40CFR. He explained that 2 years have been spent trying to correct this situation, and the only stumbling block has been in obtaining the building permit. John stated that just last month the building permit application expired and the reason is that SD City Fire Department wanted to make the storage area meet UFC Art.80 requirements. John stated the facility would like to relocate the hazardous waste storage area next to Bldg 83. He showed us the site, where preliminary work had been done. The proposed location would be next to the hazardous materials storage area, and be of similar design-chain link fence with canvass walls. In addition, each cell of the area would be sloped, have a separate blind sump, and be able to contain 110% of the maximum capacity of the cell. I stated that in the compliance report this year we would include

language to the effect that may assist them in clearing this hurdle with the Fire Department.

We then went to ERM office where John and Jim explained the log system for all hazardous waste generated. John stated they keep track of all waste generated for all plants. He showed me a recent logbook that had not yet incorporated the drums of waste generated at their newest facility in Imperial. Overall, there is a drummed waste log, a non-drummed waste log, a tank and treatment waste log, and a manifest log. I asked about the lab-pack log. John stated that Rollins creates and keeps this log.

In the drummed waste log, John explained that he manages about 2,000 drums per year. He primarily uses Rollins now for this disposal. He explained the log in detail. He uses codes for pricing categories:

RO = landfill restricted organic  
NR = nonrestricted waste  
BF = flammable waste (goes to SYSTEC)  
BO = oily waste (goes to SYSTEC)  
RS = recyclable solvent  
IW = inorganic waste

The non-drummed waste logs had four primary waste streams:

Prepreg

Asbestos

Sludge (F006 waste)

PCBs. (John explained that recently at the Kearny Mesa facility they had taken out some light and found the ballast from the light was contaminated with PCBs. He stated this was incidental, not a regularly occurring waste stream.)

John stated that as of 5/90, he has been updating the waste characterizations of the waste streams.

John gave Ben Franklin copies of the biennial reports which were generated for all their facilities. He asked us to explain the billing procedure by HMMD, as his biennial report listed 52 waste streams, while the HMMD permit listed 25 waste streams. I explained that we bill based on waste streams and amounts, and that our philosophy was to consolidate waste streams, in order to simplify record keeping. I asked John if he wanted us to simply transcribe the biennial report form as waste streams on our computer, stating that this may cause his bill to increase. John stated he did not care. I stated that Ben Franklin would prepare a narrative report describing how he would resolve this issue.

At this point we took a half-hour lunch break. John told us that Mike Haro recently left General Dynamics and is now working for Northrup in Torrance, Ca. He stated Mike's position had not yet been filled, although Jennifer Kraus was applying for the position.

When we returned from lunch I asked to check on the status of the underground storage tank records and remarks from the last

inspection. John stated that every year the issues about underground tanks come up and no resolution has been made to-date. John stated that just the other day Jim Atkinson was made head of underground tank issues.

We first sought the underground tanks listed as LF-21M and LF-22M. We found these referred to tanks at Plank Mills 1 & 2 in Bldg 1. We found a set of blue prints at Plank Mill#1, dated 7/89, which gave a schematic of the machine coolant sumps, trenches, and underground tank. We learned that the north sump was pumped out and the south sump was in use, with the 2.5K UST for Plank Mill #1 filled in place with concrete. We observed an aboveground storage tank had been installed, and plumbing from the south sump was contained in a cement trench.

We observed that Plank Mill#2 had not been changed. We removed the grating over the tank and observed liquid in the tank.

I stated that the UST at Plank Mill#1 may have been closed in place without a permit from our office. I stated the I was not certain this constituted an UST per Title 23. I stated that first we would need to make a determination if the material in the tank (machine coolant) was a hazardous material. I stated that this issue would be referred to Site Assessment and Mitigation, and they would know better if SW-846 had prescribed test methods for such a material, since it is required to have soil sampling from under each underground tank that is closed. This sampling would determine the extend of contamination to the soil and/or groundwater. John acknowledged this was a problem and he stated they dealt with Donn Lipera in Site Assessment and Mitigation.

We then visited the Heat Treatment Ovens, there are 2 onsite. John stated the parts are quenched in a bath of 10-20% ethylene glycol. He was not sure of the capacity of these cement tanks, and estimated they should be about 10-15K gallons each. Again I stated this was a grey area in UST regulations.

I observed two aboveground water tanks, and a sodium nitrate tank which were also suspected of being set in a blind-ended concrete sump. I could not observe how deep the sump was, nor whether there was an accumulation of material in the sump.

Within bldg 78 we observed an onsite coolant recycling centrifuge system. John stated they have a contract with Fluid Recycling to manage their rancid coolant. John explained that coolant is first collected from draining of metal from the roll-off, pumped into the white-above ground storage tank, taken by the blue ponies into the above-ground storage tanks inside, where coolant is centrifuged. One tank hold clean coolant, the other holds dirty coolant. If the coolant is not managed properly, it may have to go into the rancid aboveground tank in salvage.

We observed (3) white, plastic, aboveground storage tanks which John stated were only for waste oil. He said each had a maximum

capacity of 675 gallons, and this waste goes to SYSTEC for use as fuel to burn. I stated that it was my understanding the waste oil must be recycled. John stated the facility does not manage it as used oil pr Title 22, but as hazardous waste. He stated that the used oil regulations were for controlling the service stations, and as long as his facility managed it as hazardous waste, he did not fall subject to Article 13.

We inspected the paint shop satellite generation points. I asked if they had considered installing a solvent recycling/distillation unit. John stated one had been purchased and had not yet been shipped to the facility. He stated this was scheduled for 1990, and it would only handle the gun wash solvent waste.

I asked how often the wastewater paint waste from spray booths was cleaned out. John stated they remove 3-4K gallons of wastewater each week, and this is done by Pacific Treatment Corporation. He stated this wastewater was designated to go to the Fixed Treatment unit. John also stated that in bldg. 2 they were planning to replace an existing paint line, at the north end.

In bldg.2 we observed the new dye-penetrant system. This process is designed with several cells in which parts get penetrant spray and black-lamp inspected, and rinse water collecting directly below, into an unlined-concrete sump. John stated there is always dye-penetrant wastewater in the sump. I observed a sanitary sewer standpipe, with a pump attachment. We discussed that it would be best to have the pump regularly remove the wastewater so that the sump is kept as dry as possible. I asked John if the dye-penetrant was a hazardous material. John stated that it is essentially made of surfactants, dye and kerosene. He stated the kerosene content was high. We discussed that this arrangement was another grey area with respect to storage, and underground storage tanks.

Prior to exiting, we all met with Gerry Hardacre. I briefed the group on a conversation I had with John Anderson (RWQCB), after our visit on July 18th. I stated that John Anderson had the impression the sump in bldg. 75 did, technically meet the criteria of a surface impoundment. However, John Anderson also stated that the toxic pit legislation was intended to be temporary, and the legislators did not expect it to still be in effect to-date. He went on further to explain that the criteria for resolving surface impoundments would adversely affect the corrective actions that Convair is in the process of implementing, with respect to the fixed wastewater treatment unit. John Anderson and I made a tentative arrangement for a follow-up meeting on Friday July 27th, to discuss this in more detail. We tentatively agreed that surface impoundment legislation should not be pursued unless an acceptable plan of corrective action with respect to the proper management of the sump was submitted by Convair.

I stated that although it was my impression the underground storage tank regulations did not intend to regulate machine coolant, dilute dye-penetrant, and dilute ethylene glycol, I would refer the closed

machine coolant tank to Site Assessment, and follow-up with the State Water Resources Board, in a meeting I am attending in September.

I asked Ben Franklin to make arrangements to have the business plan portion of the inspection conducted with Anne Elliott. Ben stated there had been a generic meeting with General Dynamics representatives regarding business plan criteria for all their facilities. John Fields stated that they had no problem preparing a business plan to our criteria, although he felt we needed to be more specific. We tentatively scheduled a follow-up meeting, with A. Elliot on August 6th at 9:00 am.

This follow-up date was the earliest time which met all our time constraints. Most of us will be attending the IEASD conference on August 1,2; Ben Franklin was to be unavailable the following week, and I will be meeting with John Anderson. I stated that we would prepare and issue the annual compliance report, along with a copy of our field notes.